

OUTTEN & GOLDEN LLP

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**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

MARIA VICTORIA PEREZ, KAELA
R.M. BROWN, and CAROLINE
WHITAKER, individually and on behalf of
all others similarly situated,

Plaintiffs,

v.

ALLSTATE INSURANCE COMPANY,

Defendant.

11-CV-1812 (AMD) (AKT)

**PLAINTIFFS' NOTICE OF
UNOPPOSED MOTION FOR
APPROVAL OF DISPUTE
ADJUSTER SETTLEMENT,
SERVICE AWARD, AND
ATTORNEYS' FEES AND
EXPENSES**

For the reasons set forth in the Memorandum of Law in Support of Plaintiffs' Unopposed Motion for Approval of Dispute Adjuster Settlement, Service Award, and Attorneys' Fees and Expenses ("Settlement Approval Motion"), the supporting Declaration of Michael J. Scimone ("Scimone Declaration"), and the Exhibits attached thereto, Plaintiffs respectfully move this Court for an Order granting the following relief. A proposed order is attached hereto as **Exhibit A**.

- (1) Approve the Parties' Addendum to Joint Agreement of Settlement and Release ("Settlement Addendum"), attached to the Scimone Declaration as Exhibit 1;
- (2) Approve the Proposed Settlement Notice, attached to the Settlement Addendum as Exhibit A, and direct its distribution;
- (3) Approve a Service Award of \$5,000 to Plaintiff Caroline Whitaker;
- (4) Approve Plaintiffs' request for \$141,996.66 in Attorneys' fees;

- (5) Approve the third-party Settlement Administrator, Rust Consulting;
- (6) Incorporate the terms of the Settlement Addendum;
- (7) Dismiss this case with prejudice; and
- (8) Retain jurisdiction to enforce the Settlement Addendum.

Dated: September 2, 2021
New York, New York

Respectfully submitted,

OUTTEN & GOLDEN LLP

By:

/s/ Michael J. Scimone

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